

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA) Case No. 1:16-CR-169
)
 v.) Honorable Gerald Bruce Lee
)
 RAUSHI J. CONRAD,) Trial: April 24, 2017
)
 Defendant.)

GOVERNMENT'S FIRST AMENDED EXHIBIT LIST

The United States of America, by and through undersigned counsel, hereby submits its list of trial exhibits.

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
<u>Financial Records, Transactional Records, Invoices, and Contracts</u>					
1-1	CPE Invoice No. 127 dated 12/10/2010	1B1-001162			
1-2	CPE Invoice No. 137 dated 2/2/2011	1B1-001164			
1-3	CPE Invoice No. 2172 dated 6/17/2011	1B1-001167			
1-4	CPE Invoice No. 1472 dated 8/11/2011	1B1-001169			
2	American Express records for account in the name of Raushi J Conrad, account no. ending in 92009	1A123-001005 to 1067			
3	Bankruptcy schedules, <i>In re Raushi J Conrad</i> , Case No. 13-13927, Doc. No. 12	BK-00000001 to 40			
4	BB&T Bank records for account in the name of The Chicken Place Express, account no. ending in 9546	1A013-000007 to 8; 1A013-000012 to 186			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
5	BB&T Bank records for account in the name of Chicken Place Group Inc, account no. ending in 9554	1A013-000009 to 10; 1A013-000219 to 221; 1A013-000348 to 350			
6-1	Bedford's Images Inc. invoice no. 1680 dated 7/8/2010	RC-MAIN-00005976			
6-2	Bedford's Images Inc. invoice no. 1681 dated 7/19/2010	RC-MAIN-00005978			
6-3	Bedford's Images Inc. invoice no. 1683 dated 9/23/2010	RC-MAIN-00005985			
6-4	Bedford's Images Inc. invoice no. 1684 dated 11/9/2010	RC-MAIN-00005961			
6-5	Bedford's Images Inc. invoice no. 1689 dated 2/7/2011	RC-MAIN-00006007 to 6008			
6-6	Bedford's Images Inc. invoice no. 1692 dated 3/4/2011	RC-MAIN-00006019 to 6020			
6-7	Bedford's Images Inc. invoice no. 1693 dated 3/4/2011	RC-MAIN-00006022 to 6023			
6-8	Bedford's Images Inc. invoice no. 1694 dated 4/5/2011	RC-MAIN-00006016			
6-9	Bedford's Images Inc. invoice no. 1696 dated 5/9/2011	RC-MAIN-00005991			
7	Bedford's Images, Inc. Schedule K-1, James C. Bedford, 2010	1B049-000046			
8	Bedford's Images, Inc. Schedule K-1, James C. Bedford, 2011	1B049-000140			
9	Boyd Plumbing, Heating & Air Conditioning, L.C. invoice no. 2735-1 dated 5/11/2011	1B069-000114			
10-1	Contractor invoices issued by Bina Martin-Giles	1B7-002797			
10-2	Contractor invoices issued by Brittney Li	1B1-000227			
10-3	Contractor invoices issued by Danielle Hodge	1B1-000045; 47; 49; 51; 53; 55; 57; 59; 1B7-002773; 2785; 2803			
10-4	Contractor invoices issued by Jeremy Baker	1B5-001059; 1061; 1063; 1065; 1067; 1069; 1071; 1073; 1075; 1077; 1079			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
10-5	Contractor invoices issued by Kenneth Hodge	RC-MAIN-00005375; 5378; 5380; 5383; 5387; 5389; 5391; 5393			
10-6	Contractor invoice issued by Rebecca Pulluaim	1B079-000266			
10-7	Contractor invoices issued by Shannon Bedford	1B1-000018; 20; 22; 24; 26; 28; 1B7-002775; 2794			
10-8	Contractor invoices issued by Una Trammel	RC-MAIN-00005313 to 5316; 5318; 5320; 5322; 5326; 5328			
10-9	Contractor invoice issued by Wray Jones	1B5-001081			
11	Delaney Harris Purchase Order No. 454824	1B1-000916			
12	Fairfax Company of Virginia, LLC accounting and payment records for The Chicken Place	1A012-000094 to 137; 141 to 143; 146 to 156; 159 to 160; 164 to 167; 172 to 174; 185 to 188; 196 to 198; 204 to 206; 208; 211 to 212; 636; 639			
13	IRS Forms 1040, W2, and associated schedules for Raushi J. Conrad and Ana Conrad, tax year 2010	RC-IRS-00000139 to 153			
14	IRS Forms 1040, W2, and associated schedules for Raushi J. Conrad and Ana Conrad, tax year 2011	RC-IRS-00000182 to 192			
15	IRS Form 1120S, Schedule K1, and associated schedules for The Chicken Place Express, tax year 2010	RC-IRS-00000177 to 181			
16	IRS Certification of Lack of Record, The Chicken Place Express, tax year 2011	RC-IRS-00000138			
17	National Place Lease Company, LLC lease ledger for The Chicken Place Express	1A008-000560.xls			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
18	Northwest Federal Credit Union records for vehicle loan and home equity line of credit in the name of Raushi J. Conrad	1A007-000017 to 40; 154 to 156;			
19	Notification of Personnel Action form for Raushi J. Conrad dated 10/28/2011	RC-DOCOIG-00000318			
20	Office Depot receipt dated 06/29/2010	1B5-000341			
21	PNC Bank records for account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_2-000012 to 13; 47 to 68; 1A161 1 OF 2_1-000004 to 10 1A161 1 OF 2_1-000544 to 1124			
21-1	Check No. 1539 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-000650			
21-2	Check No. 1546 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-000684			
21-3	Check No. 1574 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-000740			
21-4	Check No. 1546 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-001046			
21-5	Check No. 1440 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-000881			
21-6	Check No. 1452 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-000898			
21-7	Check No. 1589 drawn on PNC Bank account in the name of Team America Contractors, Inc., account no. ending in 5448	1A161 1 OF 2_1-001032			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
22	PNC Bank records for account in the name of The Chicken Place Express, account no. ending in 0924	1A161 2 OF 2-000249; 393 to 414; 572 to 587			
23	Powell Contracting LLC email and attached invoice No. 216 dated 5/4/2011	1A150-000445 to 446			
24	Powell Contracting LLC email and attached invoice No. 226 dated 6/24/2011	1A150-000532 to 533			
25	Requisition for Supplies / Service dated 9/7/2011	RC-MAIN-00005915 to 5916			
26	Solicitation / Contract / Order For Commercial Items form dated 9/7/2011	RC-MAIN-00005913 to 5914			
27	SunTrust Bank records for account in the name of Team America Contractors Inc., account no. ending in 6995	RC-MAIN-00006838 to 6839; RC-DOCOIG-00049048 to 49057; 49080 to 49169; 49266 to 49427			
27-1	Check No. 100 drawn on SunTrust Bank account in the name of Team America Contractors, Inc., account no. ending in 6995	RC-DOCOIG-00049081			
27-2	Check No. 1219 drawn on SunTrust Bank account in the name of Team America Contractors, Inc., account no. ending in 6995	RC-DOCOIG-00049113			
27-3	Check No. 1240 drawn on SunTrust Bank account in the name of Team America Contractors, Inc., account no. ending in 6995	RC-DOCOIG-00049102			
27-4	Check No. 1149 drawn on SunTrust Bank account in the name of Team America Contractors, Inc., account no. ending in 6995	RC-DOCOIG-00049156			
28	TD Bank records for account no. ending in 5240	1A122-000254 to 256			
29	Team America Contractors, Inc. Schedule K-1, James C. Bedford, 2011	1B049-000014			
30-1	Team America Contractors, Inc., Form 1099-MISC, Brittany Li, 2011	1B089-000588			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
30-2	Team America Contractors, Inc., Forms 1099-MISC, Danielle Hodge and Kenneth Hodge, 2010	1B089-000614			
30-3	Team America Contractors, Inc., Form 1099-MISC, Danielle Hodge, 2011	1B089-000579			
30-4	Team America Contractors, Inc., Form 1099-MISC, Jeremy Baker, 2011	1B089-000580			
30-5	Team America Contractors, Inc., Form 1099-MISC, Kenneth Hodge, 2011	1B089-000581			
30-6	Team America Contractors, Inc., Forms 1099-MISC, Rebecca Pulluaim and Shannen Bedford, 2010	1B089-000615			
30-7	Team America Contractors, Inc., Form 1099-MISC, Una Trammel, 2010	1B089-000616			
30-8	Team America Contractors, Inc., Form 1099-MISC, Una Trammel, 2011	1B089-000582			
31-1	Tridea Works, LLC check and check stub no. 4844	RC-MAIN-00005974			
31-2	Tridea Works, LLC check and check stub no. 4881	RC-MAIN-00005983			
31-3	Tridea Works, LLC check and check stub no. 4899	RC-MAIN-00005959			
31-4	Tridea Works, LLC check and check stub no. 4943	RC-MAIN-00006002			
31-5	Tridea Works, LLC check and check stub no. 4962	RC-MAIN-00006011			
31-6	Tridea Works, LLC check and check stub no. 4973	RC-MAIN-00006017			
31-7	Tridea Works, LLC check and check stub no. 4989	RC-MAIN-00005989			
32-1	Tridea Works, LLC Job Status Report dated 08/06/2010	RC-MAIN-00005973			
32-2	Tridea Works, LLC Job Status Report dated 10/22/2010	RC-MAIN-00005981 to 5982			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
32-3	Tridea Works, LLC Job Status Report dated 11/18/2010	RC-MAIN-00005958			
32-4	Tridea Works, LLC Job Status Report dated 02/09/2011	RC-MAIN-00006001			
32-5	Tridea Works, LLC Job Status Report dated 04/13/2011	RC-MAIN-00006010			
32-6	Tridea Works, LLC Job Status Report dated 05/25/2011	RC-MAIN-00005988			
33-1	Tridea Works, LLC Voucher Edit Report, voucher no. 1215	RC-MAIN-00005975			
33-2	Tridea Works, LLC Voucher Edit Report, voucher no. 1216	RC-MAIN-00005977			
33-3	Tridea Works, LLC Voucher Edit Report, voucher no. 1329	RC-MAIN-00005984			
33-4	Tridea Works, LLC Voucher Edit Report, voucher no. 1378	RC-MAIN-00005960			
33-5	Tridea Works, LLC Voucher Edit Report, voucher no. 1523	RC-MAIN-00006006			
33-6	Tridea Works, LLC Voucher Edit Report, voucher no. 1655	RC-MAIN-00006018			
33-7	Tridea Works, LLC Voucher Edit Report, voucher no. 1650	RC-MAIN-00006015			
33-8	Tridea Works, LLC Voucher Edit Report, voucher no. 1724	RC-MAIN-00005990			
33-9	Tridea Works, LLC Voucher Edit Report, voucher no. 1656	RC-MAIN-00006021			
34	Tridea Works, LLC subcontract agreement with Bedford's Images, Inc., dated 6/14/2010	1A150-000168 to 1A150-000176			
35	Tridea Works, LLC subcontract agreement with Bedford's Images, Inc., dated 11/5/2010	RC-DOCOIG-00036936 to 36944			
36	Virginia State Corporation Commission records for Bedford's Images, Inc.	RC-MAIN-00002859 to 2884			
37	Virginia State Corporation Commission records for The Chicken Place Express	RC-MAIN-00002721 to 2730			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
38	Virginia State Corporation Commission records for Chicken Place Group Inc.	RC-MAIN-00002773 to 2778			
39	Virginia State Corporation Commission records for Team America Contractors, Inc.	RC-MAIN-00002779 to 2801			
40	Wells Fargo Bank successor to Wachovia Bank records for account in the name of Bedford's Images Inc., account no. ending in 2939 / 6293	1A120-000122; 152; 192; 252; 312; 351; 419; 1A139-000037; 565 to 598			
41	Wells Fargo Bank successor to Wachovia Bank records for account in the name of Tridea Works, LLC, account no. ending in 9882	RC-MAIN-00006123 to 6131			
42	Audio recording of interview of Raushi Conrad on October 19, 2011	RC-DOCOIG-00004490			
42-1	Excerpt 1 of audio recording of interview of Raushi Conrad on October 19, 2011 (56:00 through 57:36)	RC-DOCOIG-00004490			
42-2	Excerpt 2 of audio recording of interview of Raushi Conrad on October 19, 2011 (1:09:29 through 1:10:13)	RC-DOCOIG-00004490			
42-T	Transcript of excerpts 1 and 2 of audio recording of interview of Raushi Conrad on October 19, 2011				
43	[Reserved]				
44	Interagency Agreement Between SPAWAR SYSCEN Charleston and DOC/BIS	1B121-000242 to 1B121-000247			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
<u>Emails</u>					
101	Email dated 6/4/2010 from Robert Moffett to Henry Hodor, cc to Kim Bryant and James Bedford, subject: "BI-INC"	RC-DOCOIG-00037079			
102	Email chain dated 3/14/2011 from Ronald Rolfe to Raushi Conrad, copying Kim Sins, subject: "RE: Please Followup On Document Transfer"	RC-DOCOIG-00054337 to 54338			
103	Email dated 2/23/2011 from Gerard Horner to Raushi Conrad, cc to Kevin Kurland, Ashley Miller, and Teresa Telesco, subject: "RE: Files that were not moved to CAI"	RC-DOCOIG-00051341 to 51342			
104	Email dated 3/1/2011 from Gerard Horner to Raushi Conrad, cc to Teresa Telesco and Mark Crawford, subject: "RE: Moving of Files"	RC-DOCOIG-00052098			
105	Email dated 6/17/2010 from James Bedford to Henry Hodor, cc to vbertrand, subject: "Re: Cost Estimate"	RC-DOCOIG-00037055 to 37057			
106	Email from Valetta Bertrand to Raushi Conrad, cc to James Bedford, dated 9/7/2011, subject: "Estimate from TEAM AMERICA CONTRACTORS, INC" and attachment	RC-DOCOIG-00084700 to 84701			
107	Email from Raushi Conrad to Patricia Woodberry, cc Eddie Donnell, dated 9/8/2011, subject: "Re: Estimate from TEAM AMERICA CONTRACTORS, INC"	RC-DOCOIG-00090599			
108	Email from Raushi Conrad to Kim Sins dated 3/17/2011, subject: "SOW"	RC-DOCOIG-00000574			
109	Email from Kim Bryant to James Bedford, cc to Robert Moffett, Kim Sins, Henry Hodor, Tan Tran, dated 2/9/2011, subject: "Work For DOC/BIS"	RC-DOCOIG-00036985			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
110	Email from Kim Bryant to Raushi Conrad dated 2/22/2011, subject: "RE: Political Staff File Transfers"	RC-DOCOIG-00051140 to 51141			
111	Email from Kim Sins to Raushi Conrad, Carlton Parks, cc to Eddie Donnell, dated 5/11/2011, subject: "RE: migration files"	RC-DOCOIG-00062845			
112	Email from Kim Sins to Eddie Donnell, Raushi Conrad, Jack Ward, dated 4/4/2011, subject: "Document Migration Contractor"	RC-DOCOIG-00057752			
113	Email from James Bedford to Henry Hodor, cc to Valetta Bertrand, dated 6/17/2011, subject: "RE: Cost Estimate"	RC-DOCOIG-00037055 to 37057			
114	Email from Robert Moffett to James Bedford dated 2/9/2011, subject: "Re: Changing organizations"	1A152 2 OF 2-000530			
115	Email from Robert Moffett to James Bedford dated 6/4/2010, subject: "SOW"	1A152 1 OF 2-000653			
116	Email from Jian Mao to Raushi Conrad, Dawn Leaf, and Eddie Donnell dated 9/28/2005, subject: "Fyi – Knowcean led networking design/service for the SI's data migration center effort"	1A151-000069			
117	Email from Raushi Conrad to Patricia Woodberry, dated 9/7/2011, subject: "Fw: Estimate from TEAM AMERICA CONTRACTORS, INC"	RC-DOCOIG-00090586 to RC-DOCOIG-00090587			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
<u>Stipulations</u>					
201	Stipulation Regarding Defendant's Status as a Public Official	N/A			
202	Stipulation Regarding Authenticity and Business Record Foundation of Certain Documents	N/A			
<u>Transcripts</u>					
301	Transcript of testimony of Charles Boyd	RC-GJ-00000044 - 61			
302	Transcript of testimony of Danielle Hodge	RC-GJ-00000025 - 43			
303	Transcript of testimony of Kenneth Hodge	RC-GJ-00000089 - 108			
304	Transcript of testimony of Quentin Powell	RC-GJ-00000164 - 183			
305	Transcript of testimony of Jeremy Baker	RC-GJ-00000001 - 24			
306	Transcript of testimony of Alice Bertrand	RC-GJ-00000109 - 163			
307	Transcript of testimony of Glenn Bertrand, Jr.	RC-GJ-00000292 - 332			
308	Transcript of testimony of Valetta Bertrand	RC-GJ-00000618 - 673			
309	Transcript of testimony of Una Trammel	RC-GJ-00000062 - 88			
<u>Grand Jury Exhibits</u>					
401	Grand Jury Exhibit 1	RC-GJ-000000184 - 186			
402	Grand Jury Exhibit 2	RC-GJ-000000187			
403	Grand Jury Exhibit 3	RC-GJ-000000188			
404	Grand Jury Exhibit 4	RC-GJ-000000189			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
405	Grand Jury Exhibit 5	RC-GJ-000000190			
406	Grand Jury Exhibit 6	RC-GJ-000000191			
407	Grand Jury Exhibit 7	RC-GJ-000000192			
408	Grand Jury Exhibit 8	RC-GJ-000000193			
409	Grand Jury Exhibit 9	RC-GJ-000000194			
410	Grand Jury Exhibit 10	RC-GJ-000000195			
411	Grand Jury Exhibit 11	RC-GJ-000000196			
412	Grand Jury Exhibit 12	RC-GJ-000000197			
413	Grand Jury Exhibit 13	RC-GJ-000000198			
414	Grand Jury Exhibit 14	RC-GJ-000000199			
415	Grand Jury Exhibit 15	RC-GJ-000000200			
416	Grand Jury Exhibit 16	RC-GJ-000000201			
417	Grand Jury Exhibit 17	RC-GJ-000000202			
418	Grand Jury Exhibit 18	RC-GJ-000000203			
419	Grand Jury Exhibit 19	RC-GJ-000000205			
420	Grand Jury Exhibit 20	RC-GJ-000000206 - 207			
421	Grand Jury Exhibit 21	RC-GJ-000000204			
422	Grand Jury Exhibit 22	RC-GJ-000000208 - 209			
423	Grand Jury Exhibit 23	RC-GJ-000000210 - 220			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
424	Grand Jury Exhibit 24	RC-GJ-000000221 - 228			
425	Grand Jury Exhibit 25	RC-GJ-000000229 - 235			
426	Grand Jury Exhibit 26	RC-GJ-000000236 - 245			
427	Grand Jury Exhibit 27	RC-GJ-000000246 - 255			
428	Grand Jury Exhibit 28	RC-GJ-000000256 - 258			
429	Grand Jury Exhibit 29	RC-GJ-000000259 - 260			
430	Grand Jury Exhibit 30	RC-GJ-000000261 - 263			
431	Grand Jury Exhibit 31	RC-GJ-000000264 - 265			
432	Grand Jury Exhibit 32	RC-GJ-000000266 - 271			
433	Grand Jury Exhibit 33	RC-GJ-000000272 - 276			
434	Grand Jury Exhibit 34	RC-GJ-000000277 - 280			
435	Grand Jury Exhibit 35	RC-GJ-000000281 - 282			
436	Grand Jury Exhibit 36	RC-GJ-000000283 - 285			
437	Grand Jury Exhibit 37	RC-GJ-000000286 - 289			
438	Grand Jury Exhibit 38	RC-GJ-00000333			
439	Grand Jury Exhibit 39	RC-GJ-000000334			
440	Grand Jury Exhibit 40	RC-GJ-000000335			
441	Grand Jury Exhibit 41	RC-GJ-000000336			
442	Grand Jury Exhibit 42	RC-GJ-000000337 - 338			

Exhibit Number	Description	Bates range	Off'd	Adm'd	Notes
443	Grand Jury Exhibit 43	RC-GJ-00000339			
<u>Plea Paperwork</u>					
501	Plea agreement of James Bedford				
502	Statement of facts of James Bedford				
<u>Summary Charts</u>					
601	Summary Chart of Things of Value To/For the Benefit of Raushi J. Conrad				
602	Summary Chart of Payments From Tridea Woks, LLC to Bedford's Images, Inc. for Data Migration				
603	Summary Chart of Payments From Bedford's Images Inc to Team America Contractors, Inc for Data Migration				
604	Summary Chart of Bedford's Images Data Migration Project Revenue and Costs				
605	Summary Chart of Absence of Repayment				

The government further respectfully requests leave of the Court to file additional exhibits if necessary.

Dana J. Boente
United States Attorney

By: /s/
Matthew Burke
Jamar K. Walker
Assistant United States Attorneys
Eastern District of Virginia
Counsel for the United States of America
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Tel.: (703) 299-3700
Fax: (703) 299-3981
Email: matthew.burke@usdoj.gov
Email: jamar.k.walker@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF, which will then send a notification of such filing (NEF) to counsel of record.

Dana J. Boente
United States Attorney

By: _____ /s/
Matthew Burke
Assistant United States Attorney